

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LOCHNER TECHNOLOGIES, LLC,

Plaintiff,

V.

**HEWLETT PACKARD
COMPANY**

Defendants.

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CIVIL ACTION NO. 2:09-CV-177-CE

JOINT MOTION TO STAY ALL DEADLINES BETWEEN PLAINTIFF LOCHNER TECHNOLOGIES, LLC AND DEFENDANT HEWLETT PACKARD COMPANY

NOW COME, Plaintiff Lochner Technologies, LLC (“Lochner”) and Defendant Hewlett Packard Company (“HP”) jointly move the Court to stay all deadlines up to and including February 15, 2011, and would show the Court as follows:

I.

The parties have reached a settlement in principle and are presently working towards memorializing final agreements between the parties.

II.

The parties jointly request a stay of upcoming deadlines until February 15, 2011, so that they may finalize settlement documents and prepare and file dismissal papers.

This extension is sought not for delay but for good cause and that justice may be served.

PRAYER

Plaintiff Lochner and Defendant HP respectfully pray that the deadlines be stayed until February 15, 2011, and for such other and further relief as to which may show themselves justly entitled.

Dated: February 1, 2011

Respectfully submitted,

/s/ Danielle L. Goldstein

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Attorneys for Plaintiff
LOCHNER TECHNOLOGIES, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on February 1, 2011.

/s/ Danielle L. Goldstein
Danielle L. Goldstein

CERTIFICATE OF CONFERENCE

This is to certify that counsel for Hewlett-Packard Company has conferred with Plaintiff's counsel concerning this motion and they do not oppose the motion.

/s/ Danielle L. Goldstein
Danielle L. Goldstein